Jason M. Drangel (JD 7204) jdrangel@ipcounselors.com Ashly E. Sands (AS 7715) asands@ipcounselors.com Spencer Wolgang (SW 2389) swolgang@ipcounselors.com Mary Kate Brennan (MB 5595) mbrennan@ipcounselors.com EPSTEIN DRANGEL LLP 60 East 42nd Street, Suite 2520 New York, NY 10165 Telephone: (212) 292-5390 Facsimile: (212) 292-5391 Attorneys for Plaintiffs WowWee Group Limited, WowWee Canada, Inc. and WowWee USA, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

WOWWEE GROUP LIMITED, WOWWEE CANADA, INC. and WOWWEE USA, INC.,

Plaintiffs

v.

A249345157, ABAS, ALIAMOON, ARC WORLD ELECTRONIC (SHENZHEN) LIMITED, B2CTRADER88, CAIG, CHENXUE123, CHMIYA, COCOKI, COCOXF, CURRYDOUBLE, DAILYSPREE, DENKAPPARAT, DILUSS, DLF0003, DONGGUAN BENRAY CRAFTS & ARTS CO., LTD., DONGGUAN DEEP DREAM ELECTRONIC CO., LIMITED, DONGGUAN SANKE MOULD&PLASTIC MANUFACTURE CO., LTD., DONGGUAN SHENGSI INDUSTRIAL CO., LTD., DONGGUAN SHENGTANG SILICONE PRODUCTS CO., LTD., DONGGUAN WANSHENG SILICONE PRODUCTS CO., LTD., DONGGUAN XIE XING ELECTRONIC PLASTIC CO., LTD., DONGGUAN YOULIMEI SPORTING GOODS CO., LIMITED A/K/A KEDIMEI ELECTRONICS (SHENZHEN) CO., LIMITED, DONGGUAN YUYANG MUSICAL INSTRUMENT CO., LTD. A/K/A ZHIXIAN INDUSTRIAL LIMITED, DONGGUAN ZEQI PACKING CO., LTD. A/K/A HONG KONG CP-LINK CO., LTD, DORISZP, EONFUN, ERAINBOW, FASHION888TOY, FASHION9TOY, FASHIONFORWARD, FENGZU OUTDOOR STORE, FIRING, FRANKASON, FRANKMONEY, FROZENTOYS, FUZHOU

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RICHFORTH TRADE CO., LTD., FXSUM STATIONERY STORE, GGGZXL151019, GLASSPARADISE, GLOBALBSD888, GOTRICHTECH, GUANGZHOU ARFMA ELECTRONIC CO., LTD., GUOJINQUNQUN1, HAITENGBAO, HANGZHOU EASYLIN TRADE CO., LTD., HANGZHOU YIGE TRADE CO., LTD, HENGYI (GUANGZHOU) TRADING IMP. & EXP. CO., LTD., HYL950215, IRIS TECHNOLOGY CO., LTD., ISHENNONG, JAYTOYOFFICIAL, JESSE2017, JHZ666888, KADEN, KIMWOOD1608, KKCARDS, KOLAMOM STORE, LACHAPBELL, LEMEIHUI03, LEO_TOYS, LING2017, LWHONEY, MAIZHONGGOOD, MAXDREAM2017, MIKEXU888, MINEYKIDS, NANCHANG YONG GUAN TRADING CO., LTD., NANJING BONGEM IMPORT & EXPORT CO., LTD NINGBO FENGHUA GOGO AUTOMATIC TRADING COMPANY LIMITED, NINGBO H&D IMPORT AND EXPORT CO., LTD., NINGBO HUISEN RUBBER & PLASTIC TECHNOLOGY CO., LTD., NINGBO LANGMING IMPORT AND EXPORT LIMITED, NINGBO LENO TRADING CO., LTD., OG INTELLIGENCE STORE, OLYMPICYIM, OSINDUSTRIAL, OUHOEHKDH, OUSUSUNBABY STORE, PINKEMPRESSFANS002 A/K/A SHENZHEN PIRATE CAPTAIN TRADE CO., LTD., POINTOUCH1, ROCKYTSANG, SANCEY, SHANDONG SIMON BEARING CO., LTD., SHANGHAI2008, SHANTOU SMILOR TOYS FACTORY A/K/A SMILOR INDUSTRIAL CO., LTD., SHANXI XIN SHI YU COMMERCIAL AND TRADE CO., LTD., SHAOXING SOFA PROMOTION CO., LTD., SHENZHEN AISK ELECTRONIC CO., LIMITED, SHENZHEN AUGUSTSMOKE TECHNOLOGY CO., LTD, SHENZHEN BESTBUYTEC CO., LTD., SHENZHEN BOF TECHNOLOGY CO., LIMITED, SHENZHEN CHUANGSHIZC TECHNOLOGY CO., LTD., SHENZHEN DEEPFANS TECHNOLOGY CO., LTD., SHENZHEN EBST TRADING CO., LTD., SHENZHEN EJOY TECHNOLOGY CO., LTD., SHENZHEN E-MYWAY INDUSTRIAL CO., LTD., SHENZHEN ETINDGE ELECTRONIC CO., LTD., SHENZHEN EVER GRAND TECHNOLOGY CO., LTD. SHENZHEN FLYDA TECHNOLOGY CO., LTD., SHENZHEN FOREMOST INDUSTRIAL CO., LTD., SHENZHEN FUJIA ELECTRONICS CO., LTD., SHENZHEN FWY TECHNOLOGY CO., LTD., SHENZHEN GREIA TECHNOLOGY CO., LIMITED, SHENZHEN HAOYUNWEI TECHNOLOGY CO., LTD., SHENZHEN HERO TECHNOLOGY CO., LTD., SHENZHEN HONGSONIC ELECTRONICS CO., LTD., SHENZHEN HUAWEN TECHNOLOGY CO., LTD., SHENZHEN HYD TECHNOLOGY LTD., SHENZHEN JBK PET TECHNOLOGY CO., LTD., SHENZHEN JIEJIA TRADING COMPANY LIMITED,

SHENZHEN JINPIN BALANCE TECHNOLOGY CO., LTD., SHENZHEN JUSTCIG TECHNOLOGY CO., LTD., SHENZHEN MAKEWAY TRADING CO., LTD., SHENZHEN MIDSUN TECHNOLOGY COMPANY LIMITED, SHENZHEN MINSHUNLONG TRADING CO., LTD., SHENZHEN NABOWEI TECHNOLOGY CO., LTD., SHENZHEN NEW FLY TECHNOLOGY CO., LTD., SHENZHEN NOTION ELECTRONICS CO., LTD., SHENZHEN ONLY ACE LIGHTING TECH CO., LTD., SHENZHEN P PLUS GIFT CO., LTD., SHENZHEN PACIFIC OCEAN ELECTRONIC LTD., SHENZHEN SANDI DIGITAL CO., LTD., SHENZHEN SICMP PRINTING CO., LTD. | SHENZHEN TRULY BEAUTY INDUSTRY CO., LTD, SHENZHEN SPIRE TECHNOLOGY CO., LTD., SHENZHEN SUNLIGHTS INNOVATION & TECHNOLOGY CO., LTD., SHENZHEN SUOYA BUSINESS CO., LTD., SHENZHEN TAI LI TECHNOLOGY CO., LTD., SHENZHEN UNION CREATE JI YE TECHNOLOGY CO., LTD., SHENZHEN UPLUS TECHNOLOGY CO., LTD., SHENZHEN VICTEKE TECHNOLOGIES CO., LTD., SHENZHEN XINWANGGU TECHNOLOGY LIMITED, SHENZHEN XINYUE ELECTRONIC CO., LTD., SHENZHEN YUNWEI TECHNOLOGY CO., LTD., SHENZHEN0721, SHINY&BEAUTY1 STORE, SHOPPINGMALLTOY, SIXIREN TOY CO., LTD., GUANGZHOU, SOUTHSEA FLYING DRAGON(SHENZHEN) TECHNOLOGY CO., LTD., SUPERCARD, TIANJIN YAO POLY IMPORT AND EXPORT LIMITED COMPANY, TOPKIDSCLOTHES, TOYSCODA, TOYSFUNNY, TOYSSTORE2017, TRADEUNIVERSE, TSMQ, TTOYS STORE, TYHM A/K/A NEW NETWORK TECHNOLOGY CO., LTD, UNIQ ELECTRONICS TECHNOLOGY SHENZHEN CO., LIMITED, VIEEO, VOLCANEE02, WFZTZG01, WHITEDOLPHIN, WILLDEN_SUNGLASSES, WIN BEST IMPORT AND EXPORT CO., LTD., WISEBIZ (SHENZHEN) TECHNOLOGY LIMITED, WWWMICSELLCOM WXT694375379, XIAMEN PAPLER INDUSTRY CO., LTD., XINGNING BESTEN INDUSTRIAL CO., LTD., YIWU CADDY AARTS&CRAFTS FACTORY, YIWU DINGQIANG IMPORT AND EXPORT CO., LTD., YIWU FOZO CRAFT FACTORY, YIWU JINMING E-TRADING FIRM, YIWU LINGSHUO TRADING CO., LTD. A/K/A YIWU UNITED CRAFTS CO.,LTD, YIWU LIUHE CLOTHING FACTORY, YIWU MAX FIRM IMPORT & EXPORT CO., LTD., YIWU ROYAL COMMODITY CO., LTD., YIWU ZHOUTING TRADE CO., LTD., YOUNEED TRADING STORE, YTING3, ZHANGBX, ZHIZUN12 AND ZHUHAI HAIYUAN TECHNOLOGY CO., LTD.

 $_{\it Defendants.}$

CERTIFICATE OF SERVICE

- I, Mary Kate Brennan, hereby certify as follows:
 - 1. I am over eighteen (18) years of age and not a party to this action. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to attest to the matters stated herein. I have personal knowledge of every statement made in this Certificate of Service and such statements are true and correct.
 - 2. I am an associate attorney with the law firm Epstein Drangel LLP, a limited liability partnership located at 60 East 42nd Street, Suite 2520, New York, New York 10165. I am duly admitted to practice before the Courts of the State of New York and the United States District Court for the Southern District of New York.
- 3. I am an attorney for WowWee Group Limited, WowWee Canada, Inc. and Plaintiff WowWee USA, Inc. ("WowWee" or "Plaintiffs") in the above-captioned case.
- 4. On November 29, 2017, Plaintiffs filed this action and moved ex parte against Defendants a249345157, abas, aliamoon, Arc World Electronic (Shenzhen) Limited, b2ctrader88, caig, chenxue123, chmiya, cocoki, cocoxf, currydouble, Dailyspree, Denkapparat, diluss, dlf0003, Dongguan Benray Crafts & Arts Co., Ltd., Dongguan Deep Dream Electronic Co., Limited, Dongguan Sanke Mould&Plastic Manufacture Co., Ltd., Dongguan Shengsi Industrial Co., Ltd., Dongguan Shengtang Silicone Products Co., Ltd., Dongguan Wansheng Silicone Products Co., Ltd., Dongguan Xie Xing Electronic Plastic Co., Ltd., Dongguan Youlimei Sporting Goods Co., Limited a/k/a Kedimei Electronics (Shenzhen) Co., Limited, Dongguan Yuyang Musical Instrument Co., Ltd. a/k/a Zhixian Industrial Limited, Dongguan Zeqi Packing Co., Ltd. a/k/a HONG KONG CP-LINK CO., LTD, doriszp, eonfun, Erainbow,

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fashion888toy, fashion9toy, fashionforward, Fengzu Outdoor Store, firing, frankason, frankmoney, frozentoys, Fuzhou Richforth Trade Co., Ltd., FXSUM Stationery Store, gggzxl151019, glassparadise, globalbsd888, gotrichtech, Guangzhou Arfma Electronic Co., Ltd., Guojinqunqun1, haitengbao, HangZhou EASYLIN Trade Co., Ltd., Hangzhou Yige Trade Co., Ltd, Hengyi (Guangzhou) Trading Imp. & Exp. Co., Ltd., hyl950215, IRIS Technology Co., Ltd., Ishennong, jaytoyofficial, jesse2017, jhz666888, kaden, kimwood1608, kkcards, KOLAMOM Store, lachapbell, lemeihui03, leo_toys, Ling2017, Iwhoney, maizhonggood, maxdream2017, mikexu888, mineykids, Nanchang Yong Guan Trading Co., Ltd., Nanjing Bongem Import & Export Co., Ltd, Ningbo Fenghua Gogo Automatic Trading Company Limited, Ningbo H&D Import And Export Co., Ltd., Ningbo Huisen Rubber & Plastic Technology Co., Ltd., Ningbo Langming Import And Export Limited, Ningbo Leno Trading Co., Ltd., OG intelligence Store, olympicyim, osindustrial, ouhoehkdh, Oususunbaby Store, Pinkempressfans002 a/k/a Shenzhen Pirate Captain Trade Co., LTD., pointouch1, rockytsang, sancey, Shandong Simon Bearing Co., Ltd., shanghai2008, Shantou Smilor Toys Factory a/ka/ Smilor Industrial Co., Ltd., Shanxi Xin Shi Yu Commercial And Trade Co., Ltd., Shaoxing Sofa Promotion Co., Ltd., Shenzhen Aisk Electronic Co., Limited, Shenzhen Augustsmoke Technology Co., Ltd, ShenZhen BestBuyTec Co., Ltd., Shenzhen Bof Technology Co., Limited, Shenzhen ChuangshiZC Technology Co., Ltd., Shenzhen Deepfans Technology Co., Ltd., Shenzhen EBST Trading Co., Ltd., Shenzhen Ejoy Technology Co., Ltd., Shenzhen E-Myway Industrial Co., Ltd., Shenzhen Etindge Electronic Co., Ltd., Shenzhen Ever Grand Technology Co., Ltd., Shenzhen Flyda Technology Co., Ltd., Shenzhen Foremost Industrial Co., Ltd., Shenzhen Fujia Electronics Co., Ltd., Shenzhen FWY Technology Co., Ltd., Shenzhen

Case 1:17-cv-09358-VEC Document 26 Filed 02/05/18 Page 6 of 9 Greia Technology Co., Limited, Shenzhen Haoyunwei Technology Co., Ltd., Shenzhen HERO Technology Co., Ltd., Shenzhen Hongsonic Electronics Co., Ltd., Shenzhen Huawen Technology Co., Ltd., Shenzhen HYD Technology Ltd., Shenzhen JBK Pet Technology Co., Ltd., Shenzhen Jiejia Trading Company Limited, Shenzhen Jinpin Balance Technology Co., Ltd., Shenzhen Justcig Technology Co., Ltd., Shenzhen Makeway Trading Co., Ltd., Shenzhen Midsun Technology Company Limited, Shenzhen Minshunlong Trading Co., Ltd., Shenzhen Nabowei Technology Co., Ltd., Shenzhen New Fly Technology Co., Ltd., Shenzhen Notion Electronics Co., Ltd., Shenzhen Only Ace Lighting Tech Co., Ltd., Shenzhen P Plus Gift Co., Ltd., Shenzhen Pacific Ocean Electronic Ltd., Shenzhen Sandi Digital Co., Ltd., Shenzhen SICMP Printing Co., Ltd. a/k/a Shenzhen Truly Beauty Industry Co., LTD, Shenzhen Spire Technology Co., Ltd., Shenzhen Sunlights Innovation & Technology Co., Ltd., Shenzhen Suoya Business Co., Ltd., Shenzhen Tai Li Technology Co., Ltd., Shenzhen Union Create Ji Ye Technology Co., Ltd., Shenzhen Uplus Technology Co., Ltd., Shenzhen Victeke Technologies Co., Ltd., Shenzhen Xinwanggu Technology Limited, Shenzhen Xinyue Electronic Co., Ltd., Shenzhen Yunwei Technology Co., Ltd., shenzhen0721, Shiny&Beauty1 Store, shoppingmalltoy, Sixiren Toy Co., Ltd., Guangzhou, Southsea Flying Dragon(Shenzhen) Technology Co., Ltd., Supercard, Tianjin Yao Poly Import And Export Limited Company, topkidsclothes, toyscoda, toysfunny, toysstore2017, tradeuniverse, tsmq, TTOYS Store, tyhm a/k/a New Network Technology Co., Ltd, UniQ Electronics Technology Shenzhen Co., Limited, vieeo, volcanee02, Wfztzg01, whitedolphin, willden sunglasses, Win Best Import And Export Co., Ltd., WISEBIZ (Shenzhen) Technology Limited, wwwmicsellcom, wxt694375379, Xiamen Papler Industry Co., Ltd., Xingning Besten Industrial Co.,

Case 1:17-cv-09358-VEC Document 26 Filed 02/05/18 Page 7 of 9 Ltd., Yiwu Caddy Aarts&crafts Factory, Yiwu Dingqiang Import And Export Co., Ltd., Yiwu Fozo Craft Factory, Yiwu Jinming E-Trading Firm, Yiwu Lingshuo Trading Co., Ltd. a/k/a Yiwu United Crafts Co., Ltd, Yiwu Liuhe Clothing Factory, Yiwu Max Firm Import & Export Co., Ltd., Yiwu Royal Commodity Co., Ltd., Yiwu Zhouting Trade Co., Ltd., YouNeed Trading Store, yting3, zhangbx, zhizun12 andZhuhai Haiyuan Technology Co., Ltd. (hereinafter collectively referred to as "Defendants") for an order to seal file, a temporary restraining order, an order to show cause why a preliminary injunction should not issue, an asset restraining order, an order authorizing alternative service by electronic mail and an order authorizing expedited discovery (the "Application").

- 5. The Court issued a summons in the name of "a249345157 and all other Defendants identified in the Complaint" that applies to all Defendants ("Summons").
- 6. The Court entered an Order on December 11, 2017 granting Plaintiffs' Application (the "December 11, 2017 Order").
- 7. In the December 11, 2017 Order, the Court granted Plaintiffs' request for an order authorizing alternative service by electronic means, specifically ordering that service shall be made on Defendants and deemed effective as to all Defendants if it is completed by the following means: (1) delivery of PDF copies or a link to a secure website where each Defendant will be able to download PDF copies of the December 11, 2017 Order together with the Summons and Complaint, and all papers filed in support of Plaintiffs' Application seeking the December 11, 2017 Order to Defendants' e-mail addresses, as identified in Schedule A to the December 11, 2017 Order or may otherwise be determined; and (2) delivery of a message to Defendants through the same means that Plaintiffs' agents have previously communicated with Defendants,

Case 1:17-cv-09358-VEC Document 26 Filed 02/05/18 Page 8 of 9 namely the system for communications established by the Third Party Service Providers on their respective platforms (*i.e.*, Alibaba.com, AliExpress.com and DHgate.com), notifying Defendants that an action has been filed against them in this Court and providing a link to a secure website where each Defendant will be able to download PDF copies of the December 11, 2017 Order together with the Summons and Complaint, and all papers filed in support of Plaintiffs' Application seeking the December 11, 2017 Order.

- 8. On December 15, 2017, pursuant to the December 11, 2017 Order, we sent copies of the December 11, 2017 Order together with the Summons and the Complaint and all papers filed in support of Plaintiffs' Application seeking the December 11, 2017 Order by email using RPost's registered email system to each and every Defendant.
- 9. Also on December 15, 2017, pursuant to the December 11, 2017 Order, we sent copies of the December 11, 2017 Order together with the Summons and the Complaint and all papers filed in support of Plaintiffs' Application seeking the December 11, 2017 Order by messaging through the system for communications established by the Third Party Service Providers on their respective platforms (*i.e.*, Alibaba.com, AliExpress.com and DHgate.com) to all Defendants, except the following: Hengyi (Guangzhou) Trading Imp. & Exp. Co., Ltd., IRIS Technology Co., Ltd. (Wuhan), kimwood1608, lemeihui03, Shenzhen Tai Li Technology Co., Ltd., Southsea Flying Dragon (Shenzhen) Technology Co., Ltd. and volcanee02. (*see supra* ¶ 8).

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I declare under the penalty of perjury under the laws of the United States of America that to

the best of my knowledge the foregoing is true and correct.

Dated: December 21, 2017

New York, New York

By:

Mary Kate Brennan (MB 5595) mbrennan@ipcounselors.com

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